

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JACKSON TRAILS, LLC, a New Jersey  
limited liability corporation,

Plaintiff,

v.

TOWNSHIP OF JACKSON, a New Jersey  
municipal corporation and body politic; and  
the PLANNING BOARD OF THE  
TOWNSHIP OF JACKSON, a municipal  
agency.

Defendants.

Civ. No. 3:20-cv-01150

(Returnable 6/15/20)

**DECLARATION OF SIEGLINDE K. RATH**

Sieglinde K. Rath declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an associate attorney with Storzer & Associates, P.C., attorneys for the Plaintiff and make this declaration in that capacity.
2. I respectfully submit this Declaration in support of Plaintiff's Opposition to Defendants' Motion to Dismiss.
3. Attached hereto as **Exhibit A** is a true and correct copy of an Order entered by Judge Mark Troncone on April 7, 2020 in the consolidated action of In the Matter of the Township, a municipal corporation of the State of New Jersey; *El at Jackson, LLC v. Township of Jackson Planning Board*, Superior Court of New Jersey, Law Division, Ocean County, Dkt. No. OCN-L-1879-15, Dkt. No. OCN-L-822-92.

4. Attached hereto as **Exhibit B** is a true and correct copy of a press release entitled “Joint Statement by Governor Murphy and Attorney General Gurbir Grewal on Facebook’s Removal of AntiSemitic, Racist Group Page” obtained from the Office of the Attorney General’s website.
5. Upon information and belief, on April 20, 2020, the Planning Board of the Township of Jackson unanimously voted to vacate its denial of the application which is the subject of the lawsuit referenced in paragraph 3 above and grant preliminary approval of same.
6. Attached hereto as **Exhibit C** is a true and correct copy of the Complaint in the matter *The United States of America v. Township of Jackson and Jackson Planning Board*, United States District Court, District of New Jersey, Case No. 3:20-cv-06109 filed May 20, 2020.
7. Attached hereto as **Exhibit D** is a true and correct copy of the opinion and order in the matter *Eagle Cove Camp & Conference Center v. Town of Woodboro*, Civ. No. 10-00118, slip op. at 6-10 (W.D. Wis. Mar. 24, 2011).
8. Attached hereto as **Exhibit E** is a true and correct copy of Exhibit C to the Declaration of Mordechai Burnstein dated September 25, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.
9. Attached hereto as **Exhibit F** is a true and correct copy of Exhibit D to the Declaration of Mordechai Burnstein dated September 5, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.

10. Attached hereto as **Exhibit G** is a true and correct copy of Exhibit 49 to the Declaration of Donna Jennings dated September 6, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.
11. Attached hereto as **Exhibit H** is a true and correct copy of Exhibit 51 to the Declaration of Donna Jennings dated September 6, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.
12. Attached hereto as **Exhibit I** is a true and correct copy of the Declaration of Yisroel Schenkolewski dated August 22, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.
13. Attached hereto as **Exhibit J** is a true and correct copy of Exhibit B to the Declaration of Mordechai Burnstein dated September 5, 2019 filed in the matter of *Agudath Israel of America, et al v. The Township of Jackson, NJ, et al.*, United States District Court, District of New Jersey, Case No. 3:17-cv-03226.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 21, 2020



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Sieglinde K. Rath (#048131991)  
Storzer & Associates, P.C.

9433 Common Brook Road  
Suite 208  
Owings Mills, Md 21117  
(202) 857-9766